

MODULE III - CONTAINERS

III.A. APPLICABILITY

- III.A.1. The Permittee shall comply with UAC R315-8-9 and all the conditions of this Module. The conditions of this Module specify the storage requirements that apply to all containers of hazardous waste at the container storage unit (CSU) located at the Ashland Distribution Clearfield Facility.
- III.A.2. The CSU is constructed in accordance with Condition I.R. and Attachments 10 and 12.

III.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

- III.B.1. The Permittee may store the hazardous wastes listed below by EPA hazardous waste codes, in containers at the CSU subject to the terms of this Permit.

D001	D007	D012	D017	D022	D027	D032
D002	D008	D013	D018	D023	D028	D033
D004	D009	D014	D019	D024	D029	D034
D005	D010	D015	D020	D025	D030	D035
D006	D011	D016	D021	D026	D031	D036
D037	F008	P029	U043	U076	U112	U188
D038	F009	U001	U044	U077	U117	U190
D039	F019	U002	U051	U078	U121	U194
D040	F034	U003	U052	U079	U122	U196
D041	F035	U004	U053	U080	U123	U210
D042	F037	U008	U055	U083	U125	U213
D043	F038	U012	U056	U088	U140	U219
F001	K001	U019	U057	U090	U147	U220
F002	K048	U023	U069	U092	U154	U223
F003	K049	U028	U070	U103	U159	U226
F004	K050	U031	U071	U107	U161	U228
F005	K051	U032	U072	U108	U165	U239
F006	K052	U039	U075	U110	U171	U359
F007	K086					

- III.B.2. The Permittee may add hazardous waste codes to those specified by Condition III.B.1. through permit modification in accordance with UAC R315-4-1.5.
- III.B.3. The Permittee shall be prohibited from storing hazardous waste not identified by Condition III.B.1. and the following:
- III.B.3.a. Hydrophoric Materials;

- III.B.3.b. Pyrophoric Materials;
- III.B.3.c. Class A Explosives;
- III.B.3.d. Shock Sensitive Materials;
- III.B.3.e. Radioactive Materials;
- III.B.3.f. Compressed gas cylinders or aerosol cans which do not meet the definition of an empty container;
- III.B.3.g. F020, F021, F022, F023, F026, F027, and F028, and
- III.B.3.h. D003 Reactive waste.

III.C. CONDITION OF CONTAINERS

- III.C.1. If a container is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the contents, or the container itself, to a Department of Transportation (DOT) approved container as soon as possible but not later than 24 hours from the time the problem was discovered.
- III.C.2. The Permittee shall document such incidents in detail as follows: date of the incident, the number of containers involved, contents of the container (waste code or hazardous waste constituents), manifest number, estimated quantity of leakage, if any, equipment and materials utilized for leakage and/or transferring.

III.D. COMPATIBILITY OF WASTE WITH CONTAINERS

- III.D.1. The Permittee shall use only DOT approved containers and shall assure that the ability of the container to contain the waste is not impaired as required by UAC R315-8-9.3.

III.E. MANAGEMENT OF CONTAINERS

- III.E.1. The Permittee shall keep all containers closed, except when it is necessary to add or remove waste, and shall not open, handle, or store containers in a manner which may rupture the container or cause it to leak as specified in UAC R315-8-9.4.
- III.E.2. The Permittee shall manage containers in accordance with the Container Management Plan in Attachment 10.

- III.E.3. The Permittee shall not stack containers more than two high. Each level of containers shall be stored on pallets.
- III.E.4. The Permittee shall unload, and place into storage, any properly manifested containers of hazardous waste designated for storage at the Permittee's facility within two working days following arrival at the facility. Arrival for purposes of this permit shall be the day the transport vehicle arrived at the Ashland Distribution facility. Containers shall be placed on the loading dock after unloading where inspections shall be completed as specified in Attachment 1. Containers shall be placed in the CSU only after completion of inspection procedures and associated documentation.
- III.E.5. The Permittee shall provide storage for and maintain on-site, 85 gallon (or other applicable size) overpack drums.

III.F. CONTAINMENT SYSTEMS

- III.F.1 The Permittee shall construct and maintain the containment system in accordance with the attached plans and specifications, contained in Attachments 10 and 13 and as specified in UAC R315-8-9.6.
- III.F.2. The Permittee shall maintain an impervious coating on the floor of the CSU.
- III.F.3 The Permittee shall conduct periodic inspections of the container storage unit to demonstrate that the surface of the containment storage unit is sufficiently impervious. If a potential breach in the unit is discovered, corrective action will be taken.
- III.F.4. At maximum capacity, the Permittee may store the following volumes of material in the four storage areas within the CSU:
 - III.F.4.a. Storage Area 1 - 1,760 gallons (equivalent to 32, 55-gallon containers);
 - III.F.4.b. Storage Area 2 - Cell 1 - 12,320 gallons (equivalent to 224, 55-gallon containers); and
 - III.F.4.c. Storage Areas 2 and 3 - 9,240 gallons each (equivalent to 168, 55-gallon containers).

III.G. SPECIAL REQUIREMENTS FOR IGNITABLE WASTE

- III.G.1. The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the Facility boundary as required by UAC R315-8-9.7.
- III.G.2. The Permittee shall take precautions to prevent accidental ignition of ignitable waste and follow the procedures specified in Attachment 10 and as required by UAC R315-8-2.8(a).
- III.G.3. No open flames or smoking shall be allowed within 20 feet of the container storage areas.
- III.G.4. No reactive waste (D003) shall be stored in the CSU.

III.H. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE

- III.H.1. The Permittee shall not place incompatible wastes, or incompatible wastes and materials in the same container as specified in UAC R315-8-9.8(a).
- III.H.2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material as specified in UAC R315-8-9.8(b).
- III.H.3. The Permittee shall assure a container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers is separated from the other materials, as required by UAC R315-8-9.8(c).

III.I. IDENTIFICATION OF LOCATION OF CONTAINERS IN THE OPERATING RECORD

- III.I.1. The Permittee shall record the location of each container in the CSU. The location records shall be accurate and up to date and maintained in the operating records at the facility. The Permittee shall use the container grid system for tracking containers and their locations, which is presented in Attachment 10.

III.J. INSPECTION SCHEDULES AND PROCEDURES

- III.J.1. The Permittee shall inspect loading and unloading areas, and container storage cells, for leaks, spills, and releases each day that containers are moved within these areas.
- III.J.2. The Permittee shall use the inspection log authorized by the Executive Secretary

in Attachment 3 for conducting inspections.

- III.J.3. The Permittee shall remedy any deterioration or malfunction discovered during the inspections, described in Condition III.J, in a timely manner and as specified in Attachments 3 and 10 and Conditions II.F.2. and II.F.3.
- III.J.4. The CSU shall be inspected weekly for the presence of free liquids, in accordance with Attachment 3. Container integrity shall be inspected immediately whenever free liquids are discovered. If liquids are discovered, the Permittee shall document the location, source and estimated quantity of free liquids in the inspection log. Any liquids discovered shall be removed as soon as possible but in no case later than 24 hours after discovery. The collected standing water or free liquid shall be managed as hazardous waste unless determined not to be hazardous waste. The Permittee shall document any event associated with leaking or deterioration of containers, and cracking or deterioration of the secondary containment or floor, on the inspection log.
- III.J.5. The Permittee shall inspect weekly the integrity of the secondary containment and floor of the CSU for cracking, uneven settlement, and deteriorations, and shall inspect the concrete storage pad surface coatings for erosion, chipping, and scratching. If deteriorations are discovered in container management areas, the Permittee shall document the location, nature and extent of the deteriorations in the inspection log.
- III.J.6. For purposes of capacity as outlined in III.F.4, all containers located on the CSU shall be considered full to their respective capacities with hazardous waste.

III.K. RECORD KEEPING

- III.K.1. The Permittee shall place the results of all waste analyses and any other documentation required for compliance with the requirements of Condition III.H.3. and UAC R315-8-9.8 and UAC R315-8-2.8(b) in the facility operating record as specified in UAC R315-8-5.3. The Permittee shall maintain compliance with Condition II.F. as it provides the basis for correcting problems identified during inspection of the CSU.

III.L. CLOSURE

- III.L.1. At closure of the CSU, the Permittee shall remove all hazardous waste and hazardous waste residues from the containment system, in accordance with the procedures in the Closure Plan, Attachment 8 and as required in UAC R315-8-7 and UAC R315-8-9.9.

III.M. UNIVERSAL WASTES

III.M.1. The Permittee shall comply with the requirements of UAC R315-16 for Universal Wastes.

III.N. SUBPART CC

III.N.1. The Permittee shall comply with applicable air emission standards of UAC R315-8-22 (40 CFR 264.1080 through 264.1091 incorporated by reference), as described in Attachment 10.